

**Track 1 Decision  
Documentation Package**

**Waste Area Group 3  
Operable Unit 3-01**

**Site CPP-61**

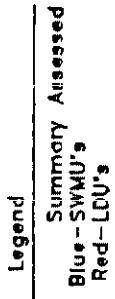
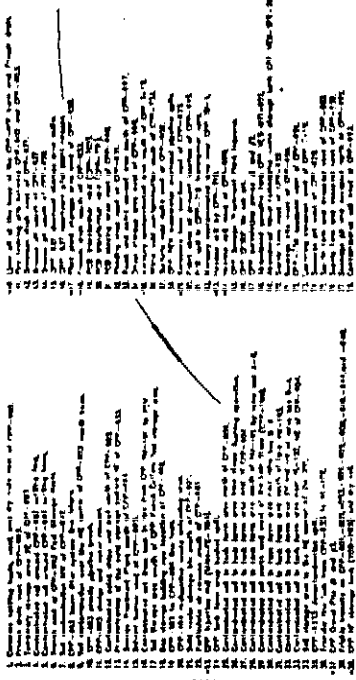
**PCB Spill in CPP-718 Transformer Yard**



**WAG 3 ENVIRONMENTAL RESTORATION PROJECT**

**INEL**

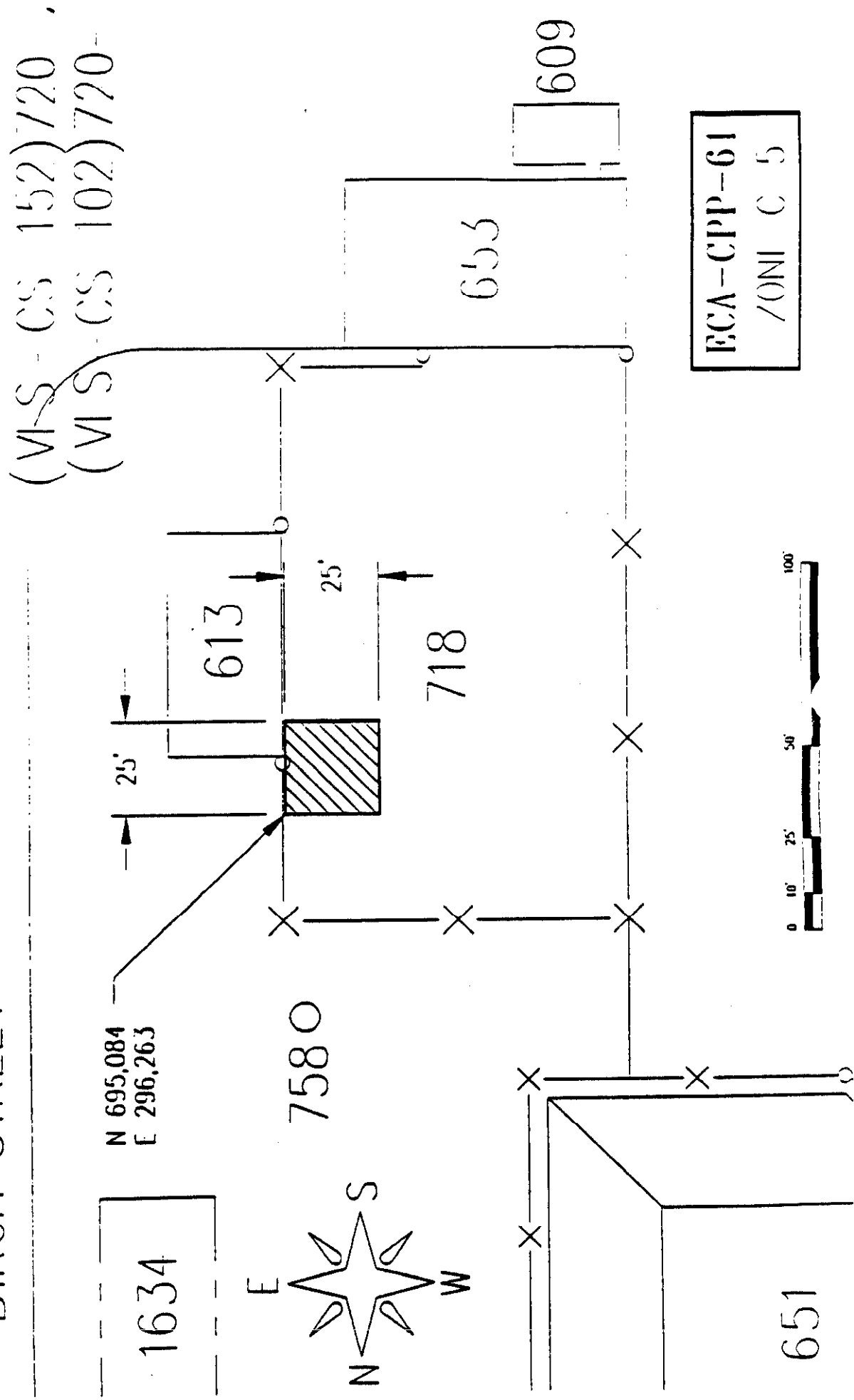
CEJ Solid Waste Management Units



100-4-14741  
(9-10)

796 | |

BIRCH STREET



ECA-CPP-61  
/ONI C 5



**DECISION DOCUMENTATION PACKAGE  
COVER SHEET**

**PREPARED IN ACCORDANCE WITH**

**TRACK 1 SITES:  
GUIDANCE FOR ASSESSING  
LOW PROBABILITY HAZARD SITES  
AT INEL**

**SITE DESCRIPTION: PCB SPILL IN THE CPP-718 TRANSFORMER YARD**

**SITE ID: CPP-61                      OPERABLE UNIT: 3-01**

**WASTE AREA GROUP: 3**

**I. SUMMARY - PHYSICAL DESCRIPTION OF THE SITE:** CPP-61 is a 25 ft. by 25 ft. area within the CPP-718 transformer yard that is the site of a PCB oil spill during the approximate time frame between Spring 1982 and July 1985. The transformer yard is approximately 95 ft. by 155 ft. in area and is surrounded by a 8 ft. tall cyclone fence. The spill occurred during the Utilities Replacement and Expansion Project (UREP) when the transformer had to operate with a 30-40% voltage overload. As a result of the voltage overload, heat expansion of the transformer oil caused a leak to occur in one of the transformer fittings. According to the existing documentation, the leak was estimated to total 400 gallons at a PCB concentration of 179 ppm; some of which was not contained and contaminated soil adjacent to the pad.

In July 1985 a cleanup of the area was initiated that is not well documented. Existing documentation consists of PCB and radiological data (collected as the PCB contaminated soil was excavated), sampling maps (not-to-scale), and hand written notes that document the clean-up effort. Excavation is reported to have been completed to a depth of 6 ft and the excavation was subsequently backfilled with soil previously removed from portions of the CPP-718 transformer yard. Analysis of the backfill soil showed PCB concentrations up to 10 ppm. Additionally, documentation and analytical results suggest that an area of residual surface contamination remains adjacent to the excavated area. Results for a sample collected from that location indicated a PCB concentration of 31 ppm.

## DECISION RECOMMENDATION

page 2

**II. SUMMARY - QUALITATIVE ASSESSMENT OF RISK:** The qualitative risk of the site is predicted by the risk assessment to be medium. The reliability of the data is medium to high. Soil backfilled to the excavation may have contained PCB concentrations of up to 10 ppm.

**III. SUMMARY - CONSEQUENCES OF ERROR:** Limited risk due to low PCB concentrations being left in the soil may result due to the no further action recommendation.

**IV. SUMMARY - OTHER DECISION DRIVERS:** The clean-up requirements provided for in the Toxic Substances Control Act (TSCA) 40 CFR 761.125 require remediation of PCBs in Industrial Areas to 25 ppm PCBs by weight in soil. The guidance provided in OWSER Directive 9335.4-01 "Guidance for Remedial Actions at Superfund Sites with PCB Contamination" also requires clean-up at restricted access industrial areas of 25 ppm PCBs by weight in soil. This clean-up requirement is based on health risk assessment criteria using occupational exposure of site workers by soil ingestion and dermal contact as the exposure scenario. Provided the established criteria in TSCA are considered an ARAR for the INEL, the existing soil concentrations can be left in place and no further action is recommended for this site. This ARAR, together with the very conservative assumptions used in performing the Track 1 risk assessment, provides for a reasonable foundation for recommending no further action at this site.

**RECOMMENDED ACTION:** No Further Action.

**SIGNATURES**

**# PAGES:**

**DATE:**

Prepared By:

DOE WAG Manager:

Approved By:

Independent Review:

DECISION STATEMENT  
(BY DOE RPM)

page 3

DATE RECD: 6/17/92

DISPOSITION:

Residual contamination average <10 ppm,  
Area excavated to 6" & backfilled with  
clean soil, residual contamination amount  
will be dealt with as routine maintenance  
action at CPP therefore no further  
action required at this time. ROD  
will address this issue.

DATE: 6/17/92

# PAGES (DECISION STATEMENT):

NAME: Janny L. Lee

SIGNATURE:



DECISION STATEMENT  
(BY EPA RPM)

page 4

DATE RECD: 4/9/92

DISPOSITION:

400 gal leak from x-fmr @ 179 ppm. Excavation of spill area to 6' & backfilled. Residual contamination to  $\leq 31$  ppm. Estimate 3.2 lbs PCB remaining @ source. The residual contamination avg  $< 10$  ppm. Samples to lab not rad. although rad contam in area of spill noted. The PCB source contamination is within cleanup criteria for PCBs and no further investigation of the PCB source appears needed. The WAG-wide RI will need to address rad contamination, however.

DATE: 4/16/92

# PAGES (DECISION STATEMENT):

NAME: Wayne Piers

SIGNATURE: Wayne Piers

DECISION STATEMENT  
(BY STATE RPM)

page 5

DATE RECD: 4/9/92 CPP-CL

DISPOSITION:

This track 1 evaluation fails to address the radiation hot spots identified in reference 4. Counts of 400-2500 exceed background of 200 cpm but these findings are not evaluated in the qualitative risk analysis.

PCB contamination is addressed and soil removal efforts seem to have addressed risk from PCB releases.

Further evaluation of this site is required to address potential radiation level identified in this report. This effort will be undertaken through operation and maintenance of the Chem Plant and the results will be evaluated in the WAB-wide RI/FS.

DATE:

4/9/92

# PAGES (DECISION STATEMENT):

NAME:

Dean J. Nygaard

SIGNATURE:

Dean J. Nygaard



# PROCESS/WASTE WORKSHEET

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SITE ID CPP-61

Col 1 Processes Associated with this Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Process  PCB Transformer Leak	PCB Transformer Leaked an Estimated 400 Gallons of Oil to the Soil	Artifact: Concrete Pad Location: CPP-61 Description: Transformer Pad Contaminated with PCBs
		Artifact: Soil Surrounding the Concrete Pad Location: CPP-61 Description: Soil Contaminated with PCBs
		Artifact Location Description
Process		Artifact Location Description
		Artifact Location Description
		Artifact Location Description
Process		Artifact Location Description
		Artifact Location Description
		Artifact Location Description

**CONTAMINANT WORKSHEET**

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SITE ID CPP-61PROCESS (Col 1) PCB Transformer SpillWASTE (Col 2) PCBs

Col 4 What known/potential hazardous substances/constituents are associated with this waste or process?	Col 5 Potential sources associated with this hazardous material	Col 6 Known/estimated concentration of hazardous substances/constituents <sup>a</sup>	Col 7 Risk based concentration mg/kg	Col 8 Qualitative risk assessment (Hi/Med/Lo)	Col 9 Overall reliability (Hi/Med/Lo)
PCBs	Soil	<10 ppm	0.08 ppm	Med	Med

a. ND = not detected

DL = detection limit in ppm

QUALITATIVE RISK AND RELIABILITY EVALUATION TABLE			
	QUALITATIVE RISK		
	Low	Medium	High
<b>HIGHLY UN-RELIABLE</b>	screening data	TRACK II *	
<b>HIGHLY RELIABLE</b>	<b>No ACTION REQUIRED</b>	<b>RI/FS</b>	<b>INTERIM ACTION</b>
<b>reliability</b>	<b>LOW</b> concentration resulting in risk < $10^{-4}$	<b>MEDIUM</b>	<b>HIGH</b> concentration resulting in risk > $10^{-4}$
	qualitative risk		

\* if there exist sufficient data to identify an appropriate remedy

Question 1. What are the waste generation process locations and dates of operation associated with this site?

Block 1 Answer: CPP-61 is a 25 ft. by 25 ft. area within the CPP-718 transformer yard that is the site of a PCB oil spill during the approximate time frame between Spring 1982 and July 1985. The transformer yard is approximately 95 ft. by 155 ft. in area and is surrounded by a 8 ft. tall cyclone fence. The transformer yard is still currently in operation and has operated since the early 1950s.

The spill occurred during the Utilities Replacement and Expansion Project (UREP) when the transformer had to operate with a 30-40% voltage overload. As a result of the voltage overload, heat expansion of the transformer oil caused a leak to occur in one of the transformer fittings. According to the existing documentation, the leak was estimated to total 400 gallons at a PCB concentration of 179 ppm; some of which was not contained and contaminated soil adjacent to the pad.

In July 1985 a cleanup of the area was initiated that is not well documented. Existing documentation consists of PCB and radiological data, sampling maps, and hand written notes that document the clean-up effort. Excavation is reported to have been completed to a depth of 6 ft. and the excavation was backfilled with soil containing up to 10 ppm PCB contaminated soil.

Block 2 How reliable is/are the information source/s? High X Med Low (check one)

**EXPLAIN THE REASONING BEHIND THIS EVALUATION.**

The dates of the spill are documented in the PCB clean-up report.

Block 3 Has this INFORMATION been confirmed? X Yes No (check one)

**IF SO, DESCRIBE THE CONFIRMATION.**

The dates of the spill are documented in the PCB clean-up report.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information	<input type="checkbox"/>	Analytical data	<input type="checkbox"/>
Anecdotal	<input type="checkbox"/>	Documentation about data	<input type="checkbox"/>
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
Aerial photographs	<input type="checkbox"/>	Safety analysis report	<input type="checkbox"/>
Engineering/site drawings	<input type="checkbox"/>	D&D report	<input type="checkbox"/>
Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input type="checkbox"/>
Summary documents	<input type="checkbox"/>	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input checked="" type="checkbox"/> 3,4,8,9		

Question 2. What are the disposal process locations and dates of operation associated with this site?

Block 1 Answer: CPP-61 is a 25 ft. by 25 ft. area within the CPP-718 transformer yard that is the site of a PCB oil spill during the approximate time frame between Spring 1982 and July 1985. The transformer yard is approximately 95 ft. by 155 ft. in area and is surrounded by a 8 ft. tall cyclone fence. The transformer yard is still currently in operation and has operated since the early 1950s.

The spill occurred during the Utilities Replacement and Expansion Project (UREP) when the transformer had to operate with a 30-40% voltage overload. As a result of the voltage overload, heat expansion of the transformer oil caused a leak to occur in one of the transformer fittings. According to the existing documentation, the leak was estimated to total 400 gallons at a PCB concentration of 179 ppm; some of which was not contained and contaminated soil adjacent to the pad.

In July 1985 a cleanup of the area was initiated that is not well documented. Existing documentation consists of PCB and radiological data, sampling maps, and hand written notes that document the clean-up effort. Excavation is reported to have been completed to a depth of 6 ft. and the excavation was backfilled with soil containing up to 10 ppm PCB contaminated soil.

Block 2 How reliable is/are the information source/s? High ☒ Med ☐ Low (check one)

**EXPLAIN THE REASONING BEHIND THIS EVALUATION.**

The spill is documented in several of the references.

Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No (check one)

**IF SO, DESCRIBE THE CONFIRMATION.**

The spill is documented in several of the references.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information ☐ \_\_\_\_\_  
 Anecdotal ☐ \_\_\_\_\_  
 Historical process data ☐ \_\_\_\_\_  
 Current process data ☐ \_\_\_\_\_  
 Aerial photographs ☐ \_\_\_\_\_  
 Engineering/site drawings ☐ \_\_\_\_\_  
 Unusual Occurrence Report ☐ \_\_\_\_\_  
 Summary documents ☐ \_\_\_\_\_  
 Facility SOPs ☐ \_\_\_\_\_  
 OTHER ☒ 3,4,8,9

Analytical data ☐ \_\_\_\_\_  
 Documentation about data ☐ \_\_\_\_\_  
 Disposal data ☐ \_\_\_\_\_  
 Q.A. data ☐ \_\_\_\_\_  
 Safety analysis report ☐ \_\_\_\_\_  
 D&D report ☐ \_\_\_\_\_  
 Initial assessment ☐ \_\_\_\_\_  
 Well data ☐ \_\_\_\_\_  
 Construction data ☐ \_\_\_\_\_

Question 3. Is there empirical, circumstantial, or other evidence of migration?  
If so, what is it?

Block 1 Answer:

There is no evidence of migration from the site.

Block 2 How reliable is/are the information source/s? X High    Med    Low (check one)

**EXPLAIN THE REASONING BEHIND THIS EVALUATION.**

The reports document that the spill was restricted to the site .

Block 3 Has this INFORMATION been confirmed? X Yes    No (check one)

**IF SO, DESCRIBE THE CONFIRMATION.**

The reports document that the spill was restricted to the site .

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information	<input type="checkbox"/>	_____	Analytical data	<input type="checkbox"/>	_____
Anecdotal	<input type="checkbox"/>	_____	Documentation about data	<input type="checkbox"/>	_____
Historical process data	<input type="checkbox"/>	_____	Disposal data	<input type="checkbox"/>	_____
Current process data	<input type="checkbox"/>	_____	Q.A. data	<input type="checkbox"/>	_____
Aerial photographs	<input type="checkbox"/>	_____	Safety analysis report	<input type="checkbox"/>	_____
Engineering/site drawings	<input type="checkbox"/>	_____	D&D report	<input type="checkbox"/>	_____
Unusual Occurrence Report	<input type="checkbox"/>	_____	Initial assessment	<input type="checkbox"/>	_____
Summary documents	<input type="checkbox"/>	_____	Well data	<input type="checkbox"/>	_____
Facility SOPs	<input type="checkbox"/>	_____	Construction data	<input type="checkbox"/>	_____
OTHER	<input checked="" type="checkbox"/>	<u>3,4,5,6</u>			

Question 4. Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.

Block 1 Answer:

The PCB transformers have been removed and are no longer sources for release of PCBs. The soil on the site contains PCBs and can be considered a source of PCBs.

Block 2 How reliable is/are the information source/s? ☒ High ☐ Med ☐ Low (check one)

**EXPLAIN THE REASONING BEHIND THIS EVALUATION.**

The reports document the removal of the transformers and the residual PCBs in the soil.

Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No (check one)

**IF SO, DESCRIBE THE CONFIRMATION.**

The reports document the removal of the transformers and the residual PCBs in the soil.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information	<input type="checkbox"/>	Analytical data	<input type="checkbox"/>
Anecdotal	<input type="checkbox"/>	Documentation about data	<input type="checkbox"/>
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
Aerial photographs	<input type="checkbox"/>	Safety analysis report	<input type="checkbox"/>
Engineering/site drawings	<input type="checkbox"/>	D&D report	<input type="checkbox"/>
Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input type="checkbox"/>
Summary documents	<input type="checkbox"/>	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input checked="" type="checkbox"/> 3,4,5,6,8,9		

Question 5. Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?

Block 1 Answer:

The pattern of PCB distribution in the soil appears to be restricted to the area of the immediate spill. Differences in concentration can be expected in the backfill versus the native soil.

Block 2 How reliable is/are the information source/s? X High    Med    Low (check one)

**EXPLAIN THE REASONING BEHIND THIS EVALUATION.**

The reports document the contamination in the soil.

Block 3 Has this INFORMATION been confirmed? X Yes    No (check one)

**IF SO, DESCRIBE THE CONFIRMATION.**

Laboratory results document the expected concentrations of PCBs in the soil.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No. available information [ ] \_\_\_\_\_  
 Anecdotal [ ] \_\_\_\_\_  
 Historical process data [ ] \_\_\_\_\_  
 Current process data [ ] \_\_\_\_\_  
 Aerial photographs [ ] \_\_\_\_\_  
 Engineering/site drawings [ ] \_\_\_\_\_  
 Unusual Occurrence Report [ ] \_\_\_\_\_  
 Summary documents [ ] \_\_\_\_\_  
 Facility SOPs [ ] \_\_\_\_\_  
 OTHER [X] 3,4,5,6

Analytical data [ ] \_\_\_\_\_  
 Documentation about data [ ] \_\_\_\_\_  
 Disposal data [ ] \_\_\_\_\_  
 Q.A. data [ ] \_\_\_\_\_  
 Safety analysis report [ ] \_\_\_\_\_  
 O&D report [ ] \_\_\_\_\_  
 Initial assessment [ ] \_\_\_\_\_  
 Well data [ ] \_\_\_\_\_  
 Construction data [ ] \_\_\_\_\_



Question 6. Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.

Block 1 Answer:

The estimated area of the contaminated region is considered to be the boundary of CPP-61. That area is 25 ft. by 25 ft. The depth could be greater than the 6 ft excavated and remains unknown.

Block 2 How reliable is/are the information source/s? High X Med Low (check one)

**EXPLAIN THE REASONING BEHIND THIS EVALUATION.**

The reports of the excavation report the depth excavated but do not document the depth of contamination.

Block 3 Has this INFORMATION been confirmed? Yes X No (check one)

**IF SO, DESCRIBE THE CONFIRMATION.**

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information	<input type="checkbox"/>	Analytical data	<input type="checkbox"/>
Anecdotal	<input type="checkbox"/>	Documentation about data	<input type="checkbox"/>
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
Areal photographs	<input type="checkbox"/>	Safety analysis report	<input type="checkbox"/>
Engineering/site drawings	<input type="checkbox"/>	D&D report	<input type="checkbox"/>
Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input type="checkbox"/>
Summary documents	<input type="checkbox"/>	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input checked="" type="checkbox"/> 3,4,5,6		

Question 7. What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.

Block 1 Answer: The reports document that 400 gallons of 179 ppm PCB containing mineral oil was spilled on the concrete pad and soil. For the purposes of estimating the amount of PCBs that were released, the calculations shown below use an estimated soil volume of 25 ft by 25 ft by 10 ft deep. Soil density is assumed to be 3000 lb/yd<sup>3</sup>. PCB concentrations are the average of those positive concentrations as detected during the soil sampling episode (4.5 ppm).

$$4.5 \text{ ppm PCBs} \times 235 \text{ yd}^3 \text{ soil} \times 3000 \text{ lbs/yd}^3 \\ = 3.2 \text{ lbs PCBs}$$

Block 2 How reliable is/are the information source/s? High Med X Low (check one)

**EXPLAIN THE REASONING BEHIND THIS EVALUATION.**

The soil volume assumption used to calculate the PCBs released to the soil is a qualitative approximation of the affected soil volume.

Block 3 Has this INFORMATION been confirmed? Yes X No (check one)

**IF SO, DESCRIBE THE CONFIRMATION.**

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information ☐ \_\_\_\_\_  
 Anecdotal ☐ \_\_\_\_\_  
 Historical process data ☐ \_\_\_\_\_  
 Current process data ☐ \_\_\_\_\_  
 Aerial photographs ☐ \_\_\_\_\_  
 Engineering/site drawings ☐ \_\_\_\_\_  
 Unusual Occurrence Report ☐ \_\_\_\_\_  
 Summary documents ☐ \_\_\_\_\_  
 Facility SOPs ☐ \_\_\_\_\_  
 OTHER ☒ 5,6 \_\_\_\_\_

Analytical data ☐ \_\_\_\_\_  
 Documentation about data ☐ \_\_\_\_\_  
 Disposal data ☐ \_\_\_\_\_  
 Q.A. data ☐ \_\_\_\_\_  
 Safety analysis report ☐ \_\_\_\_\_  
 D&D report ☐ \_\_\_\_\_  
 Initial assessment ☐ \_\_\_\_\_  
 Well data ☐ \_\_\_\_\_  
 Construction data ☐ \_\_\_\_\_

Question 8. Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.

Block 1 Answer: Yes. The deepest soil samples obtained show concentrations of approximately 5 ppm. These data points indicate that the soil still contains PCBs.

Block 2 How reliable is/are the information source/s? ☒ High ☐ Med ☐ Low (check one)

**EXPLAIN THE REASONING BEHIND THIS EVALUATION.**

The soil data tables indicate that the deepest soil samples contained PCBs.

Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No (check one)

**IF SO, DESCRIBE THE CONFIRMATION.**

The soil data tables indicate that the deepest soil samples contained PCBs.

Block 4 **SOURCES OF INFORMATION** (check appropriate box/es & source number from reference list)

No available information ☐ \_\_\_\_\_  
 Anecdotal ☐ \_\_\_\_\_  
 Historical process data ☐ \_\_\_\_\_  
 Current process data ☐ \_\_\_\_\_  
 Aerial photographs ☐ \_\_\_\_\_  
 Engineering/site drawings ☐ \_\_\_\_\_  
 Unusual Occurrence Report ☐ \_\_\_\_\_  
 Summary documents ☐ \_\_\_\_\_  
 Facility SOPs ☐ \_\_\_\_\_  
 OTHER ☒ 5,6 \_\_\_\_\_

Analytical data ☐ \_\_\_\_\_  
 Documentation about data ☐ \_\_\_\_\_  
 Disposal data ☐ \_\_\_\_\_  
 Q.A. data ☐ \_\_\_\_\_  
 Safety analysis report ☐ \_\_\_\_\_  
 D&D report ☐ \_\_\_\_\_  
 Initial assessment ☐ \_\_\_\_\_  
 Well data ☐ \_\_\_\_\_  
 Construction data ☐ \_\_\_\_\_

## REFERENCES

1. Guidelines for the Removal of Contaminated Areas from Concrete Pad.
2. Scope of Work for Removal of PCB Contaminated Material Located at the Idaho Chemical Processing Plant.
3. Hand Written Notes Regarding the Clean-up of CPP-61\*.
4. Type Written Report on the Clean-up of PCB Contaminated Soil from Leaking Transformer XFR-8T2-2 (CPP-61)\*.
5. Final Report for 613 Clean-up (contains laboratory data generated for CPP-61 Clean-up)\*.
6. Maps Showing Sampling Locations for the Laboratory Data Presented in Reference Number 5.
7. August 8, 1986 Memo from S.C. Cooper to Several Parties Regarding PCB Clean-up.
8. August 20 Notegram from D. Joan Poland to Pete Hult Regarding Backfilling of Excavation in CPP-61.
9. Risk Assessment Information Generated by Wastren Inc.
10. Photos Documenting the Soil Clean-up Effort.

\* all references to CPP-61, CPP-718 and 613 refer to the same area.